

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

RITA C. SIMPSON-VLACH *et al.*,

Plaintiffs,

v.

MICHIGAN DEPARTMENT OF
EDUCATION, *et al.*,

Defendants.

Case No. 21-cv-11532

Judith E. Levy
United States District Judge

Mag. Judge Anthony P. Patti

**JOINT UPDATE ON THE OUTCOME OF THE ADMINISTRATIVE
PROCEEDINGS RELATED TO THE
UNDERLYING COMPLAINT**

The parties, pursuant to this Court’s January 6, 2022 Order (ECF No. 53, PageID.1425), submit this Joint Update on the Outcome of the Administrative Proceedings Related to the Underlying Complaint.

On August 9, 2021, Plaintiffs filed four due process complaints with the State of Michigan Office of Administrative Hearings and Rules against the Ann Arbor Public Schools (“AAPS”): *In the Matter of R.S.V obo M.S.V. v. Ann Arbor Public Schools*, Docket No. 21-017885; *In the Matter of R.S.V. obo A.S.V. v. Ann Arbor Public Schools*, Docket No. 21-017893; *In the Matter of K.B. obo H.P. v. Ann Arbor Public Schools*, Docket No. 21-017895; and *In the Matter of K.B. obo C.P. v. Ann Arbor Public Schools*, Docket No. 21-017897. In November 2021, Plaintiffs and

AAPS entered into Release and Settlement Agreements in each of these matters. Exhibit A hereto. Pursuant to these Release and Settlement Agreements, Administrative Law Judge Michael J. St. John entered Orders of Dismissal dismissing each matter with prejudice in November 2021. Exhibit B hereto.

Plaintiffs wish to note that the Release and Settlement Agreements each contain the following provision:

This Agreement does not set forth any understanding or settlement of any of the Student's allegations regarding procedural and systemic violations under IDEA, discrimination under the Americans with Disabilities Act, the Michigan Persons With Disabilities Civil Rights Act, Section 504 of the Rehabilitation Act or 42 U.S.C. 1983, or violations of the Racketeer Influenced and Corrupt Organizations Act ("RICO"). [See Ex. A.]

Respectfully submitted:

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January 11, 2022

CERTIFICATE OF SERVICE

I hereby certify that on January 11, 2022 I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel of record in this matter.

By: /s/ Richard J. Landau
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